

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

ALIANZA AMERICAS, YANET DOE, PABLO  
DOE, and JESUS DOE, on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

RONALD D. DESANTIS, Governor of Florida, in  
his personal capacity; LAWRENCE A. KEEFE,  
Florida Public Safety Czar, in his personal capacity;  
JAMES UTHMEIER, Chief of Staff to Florida  
Governor, in his personal capacity; JAMES  
MONTGOMERIE; PERLA HUERTA; and  
VERTOL SYSTEMS COMPANY, INC.,

Defendants.

Civil Action No.  
22-11550-ADB

**DECLARATION OF KENNETH S. LEONETTI**

I, Kenneth S. Leonetti, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney and partner of the law firm Foley Hoag LLP, co-counsel for plaintiffs Yanet Doe, Pablo Doe, and Jesus Doe (“Individual Plaintiffs”), on behalf of themselves and all others similarly situated (“Class Plaintiffs”), and Alianza Americas (“Alianza” and, together, “Plaintiffs”).

2. I submit this declaration on behalf of Plaintiffs in support of their Motion for Leave to File Second Amended Complaint.

3. Attached as Exhibit 1 to this declaration is a true and correct copy of a Fox News article by Jessica Chasmar titled “Ron DeSantis sends two planes of illegal immigrants to Martha’s Vineyard,” published September 14, 2022.

4. Attached as Exhibit 2 to this declaration are true and correct copies of screenshots of messages between Yanet Doe and Perla Huerta dated September 14 and September 15, 2022.

5. Attached as Exhibit 3 to this declaration is a true and correct copy of a Tallahassee Democrat article by Jeff Burlew titled “Former U.S. Attorney Larry Keefe Re-Emerges as Florida’s New ‘Public Safety Czar,’” published September 28, 2021.

6. Attached as Exhibit 4 to this declaration is a true and correct copy of a Miami Herald article by Nicholas Nehamas, *et al.* titled “‘You have my full support’: Top DeSantis aides played key roles in migrant flights,” published October 15, 2022.

7. Attached as Exhibit 5 to this declaration is a true and correct copy of a Politico article by Gary Fineout titled “DeSantis’ campaign manager to resume top post in Florida,” published January 23, 2024.

8. Attached as Exhibit 6 to this declaration is a true and correct copy of a New York Times article by Edgar Sandoval, *et al.* titled “The Story Behind DeSantis’s Migrant Flights to Martha’s Vineyard” published October 2, 2022.

9. Attached as Exhibit 7 to this declaration is a true and correct copy of a New York Times article by Miriam Jordan titled “G.O.P. Governors Cause Havoc by Busing Migrants to East Coast,” published August 4, 2022.

10. Attached as Exhibit 8 to this declaration is a true and correct copy of a Washington Times article by Stephen Dinan titled “Texas migrant busing crosses 10,000 mark,” published September 9, 2022.

11. Attached as Exhibit 9 to this declaration is a true and correct copy of a transcript from an episode of the program “Hannity” aired on Fox News on April 18, 2022.

12. Attached as Exhibit 10 to this declaration is a true and correct copy of an article from The Hill by Mychael Schnell titled “DeSantis signs book deal: report,” published February 17, 2022.

13. Attached as Exhibit 11 to this declaration is a true and correct copy of a CNN article by Steve Contorno titled “Ron DeSantis has raised more than \$100 million for his reelection bid. Could he use that money in a presidential race?,” published July 5, 2022.

14. Attached as Exhibit 12 to this declaration is a true and correct copy of a Washington Post article by Hannah Knowles and Mariana Alfaro titled “DeSantis dodges questions on 2024, abortion at Florida gubernatorial debate,” published October 24, 2022.

15. Attached as Exhibit 13 to this declaration is a true and correct copy of a July 17, 2021 press release from the Office of the Governor of Florida titled “Governor DeSantis Visits Southern Border to Meet with Deployed Florida Law Enforcement.”

16. Attached as Exhibit 14 to this declaration is a true and correct copy of a CNN article by Paul LeBlanc titled “DeSantis Announces Lawsuit Against Biden Administration over Immigration Policy,” published September 28, 2021.

17. Attached as Exhibit 15 to this declaration is a true and correct copy of a June 14, 2019 press release from the Office of the Governor of Florida titled “Governor Ron DeSantis Signs SB 168: Federal Immigration Enforcement.”

18. Attached as Exhibit 16 to this declaration is a true and correct copy of a June 17, 2022 press release from the Office of the Governor of Florida titled “Governor Ron DeSantis Takes Additional Actions to Protect Floridians from Biden’s Border Crisis.”

19. *Exhibit 17 omitted.*

20. *Exhibit 18 omitted.*

21. Attached as Exhibit 19 to this declaration is a true and correct copy of a document published by the office of Defendant DeSantis in December 2021 regarding his “Freedom First Budget” proposal for the fiscal year 2022-2023.

22. Attached as Exhibit 20 to this declaration is a true and correct copy of the text of Governor Ron DeSantis’ State of the State Address given on January 11, 2022, published by his office on January 11, 2022.

23. Attached as Exhibit 21 to this declaration is a true and correct copy of a response to request for quote by Vertol Systems Company, Inc. dated August 2, 2022.

24. Attached as Exhibit 22 to this declaration is a true and correct copy of screenshots of text messages between James Montgomerie and Lawrence Keefe dated August 25 and August 26.

25. Attached as Exhibit 23 to this declaration is a true and correct copy of an email sent from the account “heat19.heat19@gmail.com” to “jmontgomerie@aol.com” dated August 26, 2022.

26. Attached as Exhibit 24 to this declaration is a true and correct copy of an email sent from the account “heat19.heat19@gmail.com” to “jmontgomerie@aol.com” dated August 28, 2022.

27. Attached as Exhibit 25 to this declaration is a true and correct copy of screenshots of text messages between James Montgomerie and Lawrence Keefe dated August 26, August 28, and August 29.

28. Attached as Exhibit 26 to this declaration is a true and correct copy of an email sent from the account “heat19.heat19@gmail.com” to “jmontgomerie@aol.com” dated August 30, 2022.

29. Attached as Exhibit 27 to this declaration is a true and correct copy of a screenshot of text messages between James Montgomerie and Lawrence Keefe dated August 30, August 31, and September 1.

30. Attached as Exhibit 28 to this declaration is a true and correct copy of a screenshot of text messages between James Montgomerie and Lawrence Keefe dated September 2.

31. Attached as Exhibit 29 to this declaration is a true and correct copy of a response to request for quote by Vertol Systems Company, Inc. dated September 2, 2022, and correspondence relating thereto.

32. Attached as Exhibit 30 to this declaration are a true and correct copies of screenshots of text messages between James Montgomerie and Lawrence Keefe dated September 2.

33. Attached as Exhibit 31 to this declaration is a true and correct copy of a Miami Herald article by Mary Ellen Klas titled “Before DeSantis could say he kicked migrants out of Florida, he had to pay to fly them in,” originally published November 2, 2022, and updated February 3, 2023.

34. Attached as Exhibit 32 to this declaration are true and correct copies of screenshots of text messages between Lawrence Keefe and James Montgomerie, and Lawrence Keefe, Perla Huerta, and Sam Miller dated between September 2 and September 7.

35. Attached as Exhibit 33 to this declaration is a true and correct copy of a response to request for quote by Vertol Systems Company, Inc. dated September 6, 2022.

36. Attached as Exhibit 34 to this declaration is a true and correct copy of a requisition form issued on September 7, 2022.

37. Attached as Exhibit 35 to this declaration is a true and correct copy of a Politico article by Matt Dixon titled “DeSantis not busing immigrants because Biden stopped sending them,” published August 23, 2022.

38. Attached as Exhibit 36 to this declaration is a true and correct copy of a screenshot of text messages between Lawrence Keefe, Perla Huerta, and “Kiwi” dated August 31.

39. Attached as Exhibit 37 to this declaration is a true and correct copy of a screenshot of text messages between Lawrence Keefe, Perla Huerta, and “Kiwi” dated August 19.

40. Attached as Exhibit 38 to this declaration is a true and correct copy of a screenshot of a picture sent by text message from Perla Huerta to Lawrence Keefe.

41. Attached as Exhibit 39 to this declaration is a true and correct copy of an article by Samantha J. Gross titled “In text messages, coordinators of Ron DeSantis’ migrant flights to Martha’s Vineyard reveled in plotting surprise political stunt,” published by the Boston Globe on November 16, 2022.

42. Attached as Exhibit 40 to this declaration is a true and correct copy of a screenshot of text messages between Lawrence Keefe and Perla Huerta dated August 17.

43. Attached as Exhibit 41 to this declaration are true and correct copies of screenshots of text messages between Lawrence Keefe, Sam Miller, and Perla Huerta dated August 16, August 17, and September 5.

44. Attached as Exhibit 42 to this declaration are true and correct copies of screenshots of text messages between Lawrence Keefe and James Montgomerie dated between September 11 and September 14.

45. Attached as Exhibit 43 to this declaration is a true and correct copy of a screenshot of text messages between Lawrence Keefe and James Montgomerie dated August 29.

46. Attached as Exhibit 44 to this declaration is a true and correct copy of a Pew Research Center article titled “Key findings about U.S. immigrants,” published on August 20, 2020.

47. Attached as Exhibit 45 to this declaration is a true and correct copy of a Washington Post article by Dan Rosenzweig-Ziff, *et al.* titled “DeSantis Move to Fly Migrants to Mass. Stokes Confusion, Outrage from Critics,” published September 15, 2022.

48. Attached as Exhibit 46 to this declaration are true and correct copies of screenshots of text messages between Lawrence Keefe and James Uthmeier dated September 5 through September 15.

49. Attached as Exhibit 47 to this declaration is a true and correct copy of a screenshot of text messages sent by James Uthmeier to Luis Saenz.

50. Attached as Exhibit 48 to this declaration is a true and correct copy of a screenshot of text messages between Lawrence Keefe and James Montgomerie dated September 7.

51. Attached as Exhibit 49 to this declaration are true and correct copies of screenshots of text messages between Lawrence Keefe and James Montgomerie dated between September 8 and September 11.

52. Attached as Exhibit 50 to this declaration is a true and correct copy of a Washington Post article by Josh Dawsey *et al.* titled “DeSantis gave GOP donors a glimpse of plans for migrant flights,” published September 15, 2022.

53. Attached as Exhibit 51 to this declaration are true and correct copies of screenshots of text messages between Lawrence Keefe, Perla Huerta, and “Kiwi” between August 15 and September 12.

54. Attached as Exhibit 52 to this declaration are true and correct copies of screenshots of text messages between Lawrence Keefe and James Montgomerie dated between September 11 and September 14.

55. Attached as Exhibit 53 to this declaration is a true and correct copy of a “Quote for Aircraft Services” from Ultimate Jet Charters.

56. Attached as Exhibit 54 to this declaration is a true and correct copy of a New York Times article titled “Who Is Perla? A Central Figure in Florida’s Migrant Flight Emerges,” published October 3, 2022.

57. Attached as Exhibit 55 to this declaration are true and correct copies of Miami Herald articles by Sarah Blaskey *et al.* titled “Perla was his boss. He was her ace. Inside the covert op behind DeSantis’ migrant flights” published October 17, 2022; “Operatives linked to DeSantis promised to fly migrants to Delaware – but left them stranded,” published September 21, 2022; and ““Easy pickings’: In Texas town where Martha’s Vineyard ordeal began, few options for migrants,” published September 21, 2022.

58. Attached as Exhibit 56 to this declaration is a true and correct copy of an email from Taryn Fenske to Jessica Chasmar, dated September 14, 2022.

59. Attached as Exhibit 57 to this declaration is a true and correct copy of a Boston Herald article by Joe Battenfeld titled “Battenfeld: Florida’s DeSantis proposes sending illegal immigrants to Martha’s Vineyard,” published April 14, 2022.

60. Attached as Exhibit 58 to this declaration are true and correct copies of emails from Taryn Fenske to various media outlets, dated September 14, 2022.

61. Attached as Exhibit 59 to this declaration is a true and correct copy of an email from Taryn Fenske to Chris Van Buskirk, dated September 14, 2022.



62. Attached as Exhibit 60 to this declaration is a true and correct copy of an article published by MassLive on September 15, 2022, titled “Martha’s Vineyard welcomes immigrants sent by Florida Gov. Ron DeSantis: ‘They were met with compassion.’”

63. Attached as Exhibit 61 to this declaration is a true and correct copy of a screenshot of text messages between Lawrence Keefe and Perla Huerta dated September 14 and September 19.

64. Attached as Exhibit 62 to this declaration are true and correct copies of an email from Taryn Fenske to “Interested Media,” with attachment, dated September 16, 2022, and an email from Taryn Fenske to Bryan Griffin and Jeremy Redfern dated September 16, 2022.

65. Attached as Exhibit 63 to this declaration is a true and correct copy of an email from Taryn Fenske to Bryan Griffin dated September 19, 2022, with attachments thereto.

66. Attached as Exhibit 64 to this declaration is a true and correct copy of an email from Taryn Fenske dated September 16, 2022, titled “FW:UPDATED: Call Log 9/15.”

67. Attached as Exhibit 65 to this declaration are true and correct copies of screenshots of text messages between Lawrence Keefe and an unidentified party.

68. Attached as Exhibit 66 to this declaration is a true and correct copy of an article by Marc Caputo and Laura Egan titled “‘Punked’: DeSantis Keeps the White House, Delaware and Media Guessing on Migrant Flight Plans,” published by NBC News on September 20, 2022.

69. Attached as Exhibit 67 to this declaration is a true and correct copy of an email from Taryn Fenske to “Interested Media” dated September 19, 2022, with attachment thereto.

70. Attached as Exhibit 68 to this declaration is a true and correct copy of an email from Taryn Fenske to Marc Caputo dated September 19, 2022.

71. Attached as Exhibit 69 to this declaration is a true and correct copy of an article by Paul P. Murphy titled “DeSantis Migrant Relocation Program Planned to Transport ‘100 or More’ to Delaware, Illinois, Documents Obtained by CNN Show,” published by CNN News on October 15, 2022.

72. Attached as Exhibit 70 to this declaration is a true and correct copy of an article titled “DeSantis-linked Plan to Fly Migrants to Delaware Falls Through: Report,” published by Fox News on September 22, 2022.

73. Attached as Exhibit 71 to this declaration is a true and correct copy of an article titled “DeSantis Continuing Migrant Flights to Delaware, Other Democratic States,” published by Delaware Online on October 17, 2022.

74. Attached as Exhibit 72 to this declaration is a true and correct copy of an article by Alexandra Hutzler titled “DeSantis, White House Trade More Fire over Migrant Drop-Offs” published by ABC News on September 16, 2022.

75. Attached as Exhibit 73 to this declaration is a true and correct copy of an article by Andrew Atterbury titled “DeSantis: Flying Haitian migrants to Martha’s Vineyard is on the table,” published by Politico on March 19, 2024.

76. Attached as Exhibit 74 to this declaration is a true and correct copy of an article by Gary Fineout titled “2 top DeSantis aides depart governor’s office to help 2024 effort,” published by Politico on June 22, 2023.

77. Attached as Exhibit 75 to this declaration is a true and correct copy of an article by Gary Fineout titled “DeSantis replaces campaign manager as he struggles to catch up to Trump,” published by Politico on August 8, 2023.

78. Attached as Exhibit 76 to this declaration is a true and correct copy of an article by Ana Ceballos titled “Florida public safety czar quietly moved to DeSantis presidential campaign,” published by the Tampa Bay Times on October 14, 2023.

79. Attached as Exhibit 77 to this declaration is a true and correct copy of an article by Gary Fineout titled “DeSantis’ campaign manager to resume top post in Florida,” published by Politico on January 23, 2024.

80. Attached as Exhibit 78 to this declaration is a true and correct copy of the trial testimony of Taryn Fenske in *Warren v. DeSantis*, No. 4:22-cv-00302-RH-MAF, Dkt. 141 (N.D. Fla., filed Nov. 30, 2022).

81. Attached as Exhibit 79 to this declaration is a true and correct copy of excerpts from the trial testimony of Raymond Treadwell in *Warren v. DeSantis*, No. 4:22-cv-00302-RH-MAF, Dkt. 141 (N.D. Fla., filed Nov. 30, 2022).

82. Attached as Exhibit 80 to this declaration is a true and correct copy of a screenshot of texts between Lawrence Keefe and Bryan Griffin, filed in *Warren v. DeSantis*, No. 4:22-cv-00302-RH-MAF, Dkt. 142-34, at 1 (N.D. Fla., filed December 1, 2022).

83. Attached as Exhibit 81 to this declaration is a true and correct copy of excerpts from the trial testimony of Ryan Newman in *Warren v. DeSantis*, No. 4:22-cv-00302-RH-MAF, Dkt. 146 (N.D. Fla., filed Dec. 1, 2022).

84. Attached as Exhibit 82 to this declaration is a true and correct copy of a sworn declaration submitted by James Uthmeier in *Warren v. DeSantis*, No. 4:22-cv-00302-RH-MAF, Dkt. 91-1 (N.D. Fla., filed Oct. 20, 2022).

85. Attached as Exhibit 83 to this declaration is a true and correct copy of a screenshot of text messages between James Uthmeier, Taryn Fenske, and Kyle Lamb submitted in *Warren v. DeSantis*, No. 4:22-cv-00302-RH-MAF, Dkt. 113-19 (N.D. Fla., filed Nov. 20, 2022).

86. Attached as Exhibit 84 to this declaration is a true and correct copy of a screenshot of text messages between Taryn Fenske, Bryan Griffin, and Christina Pushaw submitted in *Warren v. DeSantis*, No. 4:22-cv-00302-RH-MAF, Dkt. 142-33 (N.D. Fla., filed Dec. 1, 2022).

87. Attached as Exhibit 85 to this declaration is a true and correct copy of responses to interrogatories of Ron DeSantis, individually and in his official capacity as Governor of the State of Florida, in *Warren v. DeSantis*, No. 4:22-cv-00302-RH-MAF, Dkt. 91-2 (N.D. Fla., filed Oct. 20, 2022).

88. Attached as Exhibit 86 to this declaration is a true and correct copy of excerpts from the trial testimony of Lawrence Keefe in *Warren v. DeSantis*, No. 4:22-cv-00302-RH-MAF, Dkt. 138 (N.D. Fla., filed Nov. 30, 2022).

89. Attached as Exhibit 87 to this declaration is a true and correct copy of excerpts from the trial testimony of Lawrence Keefe in *Warren v. DeSantis*, No. 4:22-cv-00302-RH-MAF, Dkt. 141 (N.D. Fla., filed Nov. 30, 2022).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 4, 2024  
Boston, MA

/s/ Kenneth S. Leonetti  
Kenneth S. Leonetti

**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the Court's ECF System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on July 4, 2024.

*/s/ Kenneth S. Leonetti*

---